process dictates an untimely change. Concerning incentives, providing support on a current basis, subject to true-up if appropriate, use of actual costs, application of a gross-up for income taxes (in lieu of actual taxes paid) and the use of a rate of return consistent with the level of risk might all be incentives that stimulate lower bids.

51. What, if any, safeguards should be adopted to ensure that large companies do not bid excessively low to drive out competition?

Controls can be established as part of an edit or review process that compare bidded costs to either actual costs or a surrogate of costs. Relationships (e.g., bidded cost per loop comparisons between like serving areas) can also be compared. Significant deviations in either direction can then stimulate further inquiry on a proprietary basis as part of the oversight responsibilities of either regulators or an administrator.

52. What safeguards should be adopted to ensure adequate quality of service under a system of competitive bidding?

The first step in the process is the establishment of service standards that must be common to all entities (in order to ensure competitive equity), followed by a monitoring system that incorporates both Exchange Carrier reporting and consumer input. Finally, mechanisms for remedial actions and penalties should be established along with an efficient means of dispute resolution. Included as safeguard measures should be installation speed, repair response, transmission quality, dial tone availability, emergency response, billing quality and call completions (in areas where concentrators are used).

53. How is collusion avoided when using a competitive bid?

Generally, one must respect the integrity of the participants and assume that the value of a

reputation will prevent unethical activities. Realistically, that is not always the case, particularly with new entrants in a competitive environment where the operating standards have not yet evolved or are simply not known. In these situations a study of the patterns of successful (or unsuccessful) bidding should be analyzed for common or distinct threads along with a quantitative comparative analysis of bid structure. These controls along with suitable penalties should at least be a starting point.

54. Should the structure of the auction differ if there are few bidders? If so, how?

No, the structure should not be changed; first, the presence of only a few bidders serves to confirm the fact that the need for support is an indicator of high cost, greater risk and lower profitability, the very ingredients that hinder competition. Second, any attempt to restructure can only result in an inequitable competitive situation with the incumbent usually suffering the consequences. Such a situation is not conducive to the provision of quality service.

55. How should the Commission determine the size of the areas within which eligible carriers bid for universal service support? What is the optimal basis for determining the size of those areas, in order to avoid unfair advantage for either the incumbent local exchange carriers or competitive carriers?

There are two basic elements in the determination of an "administrative area" that are usable for this purpose. The first is a wire center which is the heart of a communications operation; the second is the community of interest wherein the population share common economic, social, and political structures. A combination of these two should provide a suitable starting point. If greater granularity is necessary; that is, a more distinct focus on just the geographical areas generating high cost, then consideration might be given to the inclusion of all of an exchange outside the Base rate area. Consideration might also be given to the approach

suggested by Pacific (grids) wherein all the area within a grid probably contain similar cost characteristics. However; it should be noted that the greater degree of granularity that is used, the greater will be the administrative burdens. Finally, it should be noted that the Act defines a serving area for rural companies as being equivalent to the present day "study area". Should that definition remain intact, a comparable definition should be established for all other recipients if the process is to produce an equitable result.

Benchmark Cost Model (BCM)

56. How do the book costs of incumbent local exchange carriers compare with the calculated proxy costs of the Benchmark Cost Model (BCM) for the same areas?

ITCs does not presently have sufficient information to calculate a comparison between actual and proxy costs: however, from the information submitted to the FCC by the Exchange Carriers in February and March of 1995 and from the information supplied to NECA, comparisons could be developed by the Commission or Joint Board Staff.

The results of an examination of the information provided by the proprietors of the two models being discussed in these proceedings indicate that while they may produce costs that are acceptable for large carriers, the divergent costs of small carriers are such that actual costs should be used. Further, it does not appear that all implicit contributions are included in the process; specifically, transport and business related services appear to be excluded from the processes. Other concerns are addressed below.

57. Should the BCM be modified to include non-wireline services? If wireless technology proves less costly than wireline facilities, should projected costs be capped at the level predicted for use of wireless technology?

Except for the provision of BETRS service, wireless service should not be a consideration

in the support process unless or until the ability to provide services using all forms of technology is available to all local exchange service providers including the incumbent carrier. Otherwise, competitive equity is being traded for an ill-conceived form of technological neutrality. Further, a capping mechanism will only serve to prejudice the wireline incumbent at some point in time.

58. What are the advantages and disadvantages of using a wire center instead of a Census Block Group as the appropriate geographic area in projecting costs?

From a network standpoint, a wire center is the focal point of a single local exchange integral network and therefor, a complete exchange network with all of its components can be included as a single entity in a high cost support calculation. In addition, a single wire center will contain the full range of costs associated with the provision of service in a given area. The most significant disadvantage is that if a portion of a wire center is attractive for competitive purposes, the incumbent is compromised. An important consideration in this discussion is the monopolistic nature of rural service. Being, generally, the front line in the provision of universal service, rural areas must make the investment and service commitments that are necessary to ensure the end result. This requires a sole provider approach if those commitments are to be made. What is also important is that care must be taken to ensure that the same unit of geographical territory be applicable to all Universal Service Fund participants, i.e., all Local Exchange Carriers use the same basis for the determination of costs. It would not be appropriate for one group of Exchange Carriers to use study area aggregations while others use Census Blocks.

59. Maine PUC and several other State commissions proposed inclusion in the BCM of the costs of connecting exchanges to the public switched network through the use of microwave, trunk, or satellite technologies. Those commenters also proposed the use as additional extra-high-cost variable for remote areas not accessible by road. What is the feasibility and the

advisability of incorporating these changes into the BCM?

As proposed in the ITCs' Plan, transport is a component in the universal service process; indeed, it must be if all forms of implicit support are to be eliminated. Further, if all actual costs (common line, switching and transport) are to be considered as elements in the universal service mechanism, the technologies mentioned would be automatically included and there would be no need for special recognition of unusual circumstances. If, however, it is determined that some form of model is the only alternative, then these costs must be included if the implicit contributions that may be inherent in their pricing are to become explicit and included in the universal service component.

60. The National Cable Television Association proposed a number of modifications to the BCM related to switching cost, fill factors, digital loop carrier subscriber equipment, penetration assumptions, deployment of fiber versus copper technology assumptions, and service area interface costs. Which, if any, of these changes would be feasible and advisable to incorporate into the BCM?

Given the competitive nature of public policy and the convergence of all forms of communications into single sources for telecommunications products and services, it is important that all potential elements be included in the model.

61. Should the support calculated using the Benchmark Cost Model also reflect subscriber income levels, as suggested by the Puerto Rico Telephone Company in its comments?

The test of affordability should be the point at which the consumer is not willing to remain on the network given the price versus the value of services being offered. This is not necessarily correlated to specific levels of income. Further, there is not yet anything in the record that relates the cost of providing service to customer income level. Therefor income levels, should not be a component. Instead, using the criteria mentioned above to establish local

rate levels, complemented by Lifeline and Link-up provisions, a proper basis for the non-discriminatory pricing of services can be established.

62. The BCM appears to compare unseparated costs, calculated using a proxy methodology, with a nationwide local benchmark rate. Does use of the BCM suggest that the costs calculated by the model would be recovered only through services included in the benchmark rate? Does the BCM require changes to existing separations and access charge rules? Is the model designed to change as those rules are changed? Does the comparison of model costs with a local rate affordability benchmark create an opportunity for over-recovery from universal service support mechanisms?

ITCs' analysis of the BCM information available does not suggest that the only source of recovery for BCM derived costs is through the benchmark rate. Our interpretation is that only those costs up to a benchmark level would be recovered through that rate. All costs over and above that rate would be recovered through a universal service mechanism. Given the 1996 Act's requirement to eliminate all explicit contributions and to provide services at comparable rates, any proposal (including the ITCs' Plan) will require Part 36 changes. Further, after the interconnection principles have been completed and the Universal Service rules developed, access reform will be necessary and is a planned part of the 1996 Act implementation sequence. Once the final rules are established and should they require or allow the use of models, the models should be updated to reflect any rules change. In terms of over-recovery, the potential for either under or over-recovery is inherent in any process that uses anything other than actual costs which is a major weakness in any modeling effort that will ultimately be used as a mechanism for the determination of a valid, reliable and predictable source of revenues.

63. Is it feasible and/or advisable to integrate the grid cell structure used in the Cost Proxy Model (CPM) proposed by Pacific Telesis into the BCM for identifying terrain and population in areas where population density is low?

Both models appear to account for density and terrain in some manner; accordingly, the

advantages of integration are not readily apparent. The only exception might be the "granularity" of the CPM; however, even there, density levels are populated through use of Census Block data. In either case, it is the view of ITCs that projections based on actual costs remain the best alternative for the rural Exchange Carrier Community.

Cost Proxy Model Proposed by Pacific Telesis

64. Can the grid cell structure used in the CPM reasonably identify population distribution in sparsely-populated areas?

Any modeling effort is only as good as the data and formulas used to calculate the theoretical result; the only assurance that the results are acceptable is a comparison with actual data. Given that there are not yet test results available the determination of a "reasonable" answer is premature. Of some concern is the use of census data whether as a formula element as in the CPM or as the basic geographical area as in the BCM. The data is not current and will become even more outdated as the decade moves ahead. It may be that industry demographics are changing so quickly that data of that vintage will not be acceptable for the use intended.

65. Can the CPM be modified to identify terrain and soil type by grid cell?

According to material provided by Pacific Bell and INDETEC International, terrain, soil type, depth to rock, water table depth and other location specific characteristics are already included in the CPM process

66. Can the CPM be used on a nationwide basis to estimate the cost of providing basic residential service?

The instructions provided by the authors indicate a summarizing capability; however the

67. Using the CPM, what costs would be calculated by Census Block Group and by wire center for serving a rural, high-cost state (e.g., Arkansas)?

The instructions indicate that the basic information is prepared at the grid level and can then be summarized at higher levels. The end results are expressed as costs per unit for each defined network component which are then aggregated and compared with grid revenues. The differences are then considered to be the amount of support required. Of immediate concern is the assumption that current revenues reflect the maximum "affordable" amount. Such is not yet proven to be the case in all areas of the country.

68. Is the CPM a self-contained model, or does it rely on other models, and if so, to what extent?

While the CPM relies very heavily on a wide variety of information from other sources both internal and external to the industry, it appears to all come from actual, as opposed to modeled data.

SLC/CCLC

69. If a portion of the CCL charge represents a subsidy to support universal service, what is the total amount of the subsidy? Please provide supporting evidence to substantiate such estimates. Supporting evidence should indicate the cost methodology used to estimate the magnitude of the subsidy (e.g., long-run incremental, short-run incremental, fully-distributed).

Recognizing that there are several different viewpoints on this issue, it is ITCs' view that the amount support from the Carrier Common Line charge is the difference between the amount attributable to pure subscriber line usage (SLU) and the 25% gross allocator plus Long Term Support offset by the Subscriber Line Charge. ITCs does not have the current amounts to determine the sum total of these components. In this regard it is the opinion of ITCs that the amount attributable to SLU (up to the nationwide average CCL investment) should remain an

access charge component and that any amount over the nationwide average should be assigned to a universal service support element. In so doing the resulting CCL charge will always be comparable between urban and rural areas and the present day Long Term Support amounts would become part of universal service support. The formulas in the ITCs' Plan accomplish this objective.

70. If a portion of the CCL charge represents a contribution to the recovery of loop costs, please identify and discuss alternatives to the CCL charge for recovery of those costs from all interstate telecommunications service providers (e.g., bulk billing, flat rate/per-line charge).

First, the revenue requirement can be established on the basis of relative interstate Subscriber Line Use. The result, adjusted for usage can then be compared to a nation-wide average cost per access line. All amounts over a predetermined level (e.g., 100%) can be assigned to the support element. Such an approach provides the basis for comparable rates between and within jurisdictions. The amount under the predetermined level should offset by the Subscriber Line charge amount. The remaining support is the amount to be billed to all interstate providers as required by the 1996 Act. Such amounts should be bulk billed in a nondiscriminatory basis and be based on booked interstate revenues. For Interexchange Carriers the amount should be less access charges paid if such remain after all provisions of the Act are implemented.

Low-Income Consumers

71. Should the new universal service fund provide support for the Lifeline and Linkup programs, in order to make those subsidies technologically and competitively neutral? If so, should the amount of the lifeline subsidy still be tied, as it is now, to the amount of the subscriber line charge?

These programs should remain and be updated whenever necessary if, in so doing,

subscribership can be increased in a constructive and responsible manner. The focus of this effort should remain the Subscriber Line Charge and connection charges.

Administration of Universal Service Support

72. Section 254(d) of the 1996 Act provides that the Commission may exempt carriers from contributing to the support of universal service if their contribution would be "de minimis." The conference report indicates that "[the conferees intend that this authority would only be used in cases where the administrative cost of collecting contributions from a carrier or carriers would exceed the contribution that carrier would otherwise have to make under the formula for contributions selected by the Commission." What levels of administrative costs should be expected per carrier under the various methods that have been proposed for funding (e.g., gross revenues, revenues net of payments to other carriers, retail revenues, etc.)?

Those currently rendering payments and administering the process are in the best position to provide the actual costs involved; however, ITCs remains of the opinion that the costs involved are not sufficient enough to exclude anyone from the process and that to do so only opens the door to competitive disadvantages and therefore should be avoided. If monthly billing is prohibitive then accumulation of a longer period could be arranged. In any event, the present day process is discriminatory and should not continue.

ITCs, Inc. respectfully submits the foregoing comments in response to the Commission's request for further comment on specific questions in this proceeding.

Respectfully submitted,
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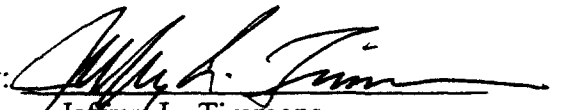
By: 
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I, Vanessa N. Duffy, a secretary with the law firm of Irwin, Campbell & Tannenwald, P.C., hereby certify that a copy of the foregoing "Comments Of ITCs, Inc. In Response To The Commission's Request For Further Comment On Specific Question In Universal Service Notice of Proposed Rulemaking" was served on August 2, 1996, by first-class U.S. mail, postage pre-paid, upon the following.

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